

FBI
CHARLOTTE, NC
JAN 16 2009
U.S. DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

UNITED STATES OF AMERICA) DOCKET NO. 3:09-cr-6
)
vs.) **BILL OF INFORMATION**
)
ANGELA BAKER) Violation:
) 18 U.S.C. § 371
)

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

1. At all times material to this Bill of Information, **Angela Baker**, and others known and unknown, conspired to commit Bank Fraud, Access Device Fraud and Identity Theft. In furtherance of the conspiracy, **Angela Baker**, opened two fraudulent checking accounts, in the identity of another person, "D.C.," using identity information provided by her co-conspirators. To obtain access devices to use as means of identification to open the fraudulent checking accounts, **Angela Baker**, used a birth certificate and a military document in the name of "D.C." to obtain a North Carolina Identification Card and photo identification cards from two club warehouse stores. **Angela Baker** also purchased a prepaid cellular telephone, and used that telephone number to open the fraudulent checking accounts. **Angela Baker** opened each checking account with a \$1300 deposit..
2. Once **Angela Baker** received the checks from the fraudulent checking accounts, she and a co-conspirator would go shopping, and would purchase items with the checks from the fraudulent accounts that she opened. **Angela Baker** would then withdraw the funds from the checking accounts before the checks cleared. **Angela Baker** and a co-conspirator would later return the merchandise purchased with the fraudulent checks to the stores for cash refunds. **Angela Baker** and her co-conspirators passed fraudulent checks, in the identity of "D.C.," at approximately a dozen different stores in the Western District of North Carolina and the Eastern District of North Carolina. Each check written, in the fraudulent "D.C.," accounts ranged in amount from approximately \$900 to approximately \$1,100. Merchandise purchased in the fraudulent scheme was held by **Angela Baker's** co-conspirators in a storage unit on Sharon Amity Road, in Charlotte, North Carolina, until the items were returned for cash refunds. **Angela Baker** was paid \$800 by one of her co-conspirators for her participation in the conspiracy.

COUNT ONE

3. The Introduction is realleged and fully incorporated herein by reference.
4. On or about March 2006-May 2006, in Mecklenburg County, within the Western District of North Carolina, and elsewhere,

ANGELA BAKER

knowingly and unlawfully did conspire with persons known and unknown, to commit Access Device Fraud and Identity Theft.

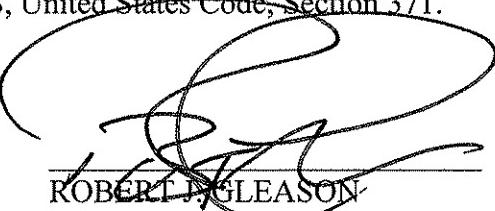
OVERT ACT

5. On or about April 2006, **Angela Baker** possessed and used, in furtherance of the conspiracy, a counterfeit birth certificate in the identity of "D.C." and military documents to obtain a North Carolina Driver's License, in the identity of "D.C.," with defendant's photograph, from the North Carolina DMV Office on Idelwild Road, Charlotte, North Carolina. **Angela Baker** then used the fictitious North Carolina Driver's License to open up accounts and obtain picture ID's in the identity of "D.C." at two club warehouse stores. **Angela Baker** then purchased a prepaid cellular telephone to use in opening checking accounts in the identity of "D.C."

6. On or about April 2006, in furtherance of the conspiracy, **Angela Baker** opened a fraudulent checking account in the identity of "D.C.," at the Bank of America branch on Park Road, Charlotte, North Carolina, and another checking account in the identity of "D.C.," at the SunTrust Bank branch on Albemarle Road, Charlotte, NC. Initially, **Angela Baker** deposited \$25 in each account to open the accounts. **Angela Baker** had the ordered checks delivered to the bank branches where they were opened and picked up the checks in person. **Angela Baker** then deposited \$1,300 into the Bank of America account. On or about April 25, 2006, **Angela Baker** deposited \$1,200 into the SunTrust Bank account.

7. On or about April 25, 2006- April 27, 2006, **Angela Baker** and one of her co-conspirators, **Angela Baker** used the fraudulent checks to purchase merchandise at numerous retail and club warehouse stores. Before the checks cleared, **Angela Baker** then withdrew all of the funds from the fraudulent accounts. Prior to the fraudulent checks being returned by the banks for insufficient funds, **Angela Baker**, along with two of her co-conspirators, returned the merchandise to the stores for cash refunds. One of **Angela Baker**'s co-conspirators paid her \$800 for opening the fraudulent accounts in furtherance of the conspiracy.

All in violation of Title 18, United States Code, Section 371.



ROBERT J. GLEASON
ASSISTANT UNITED STATES ATTORNEY